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AKSHAY S. DEORAS, P.C., LESLIE SCHMIDT,  
LESLIE M. SCHMIDT, P.C., AND MARK FAHEY

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

ZOYA KOVALENKO,  
  
Plaintiff,  
  
v.

KIRKLAND & ELLIS LLP, MICHAEL DE  
VRIES, MICHAEL W. DEVRIES, P.C.,  
ADAM ALPER, ADAM R. ALPER, P.C.,  
AKSHAY DEORAS, AKSHAY S. DEORAS,  
P.C., LESLIE SCHMIDT, LESLIE M.  
SCHMIDT, P.C., AND MARK FAHEY,  
  
Defendants.

Case No. 4:22-CV-05990-HSG

**DECLARATION OF WENDY  
CARTLAND IN SUPPORT OF  
DEFENDANTS' REQUEST FOR  
JUDICIAL NOTICE**

Date: March 30, 2023  
Time: 2:00 p.m.  
Dept: 2  
Judge: Hon. Haywood S. Gilliam

1 I, Wendy Cartland, declare as follows:

2 1. I have personal knowledge of the facts I state below, and if I were to be called as a  
3 witness, I could competently testify about what I have written in this declaration. I submit this  
4 declaration in support of Defendants Kirkland & Ellis LLP (the “Firm” or “Kirkland”), Michael De  
5 Vries, Michael W. De Vries, P.C., Adam Alper, Adam R. Alper, P.C., Akshay Deoras, Akshay S.  
6 Deoras, P.C., Leslie Schmidt, Leslie Schmidt, P.C., and Mark Fahey’s (collectively “Defendants”)   
7 Request for Judicial Notice in Support of All Defendants’ Motions to Dismiss Plaintiff’s  
8 Complaint.

9 2. I have been employed with Kirkland for almost 34 years, since 1989. All, except  
10 the first 2 years, have been in Human Resources (HR) positions. I am currently employed as the  
11 Senior Advisor-Human Resources, a position I have held since July of this year. I know the facts  
12 set forth in this declaration to be true of my own personal knowledge and/or my review of  
13 documents maintained and relied upon by the Firm in the regular course of business and to which  
14 I have access in the regular course of my job duties. If called as a witness, I could and would testify  
15 competently to the matters set forth in this declaration.

16 3. Attached as **Exhibit A** is a true and correct copy of Plaintiff Zoya Kovalenko’s  
17 (“Plaintiff”) 2021 Associate Review (“Performance Evaluation”). Exhibit A or the contents  
18 included therein are referred to in the Complaint at ¶¶11, 14, 16–19, 77, 82, 85, 88, 90, 94–95, 98,  
19 107, 115–16, 122, 126–27, 132, 138–40, 146–47, 153, 157–58, 164, 166, 169, 171, 173, 190,  
20 192–99.

21 4. Attached as **Exhibit B** is a true and correct copy of Plaintiff’s offer of employment  
22 from Kirkland (“Offer Letter”), dated September 23, 2020. Exhibit B or the contents included  
23 therein are referred to in the Complaint at ¶¶10, 61, 65–67.


24 5. Attached as **Exhibit C** is a true and correct copy of the severance agreement  
25 provided to Plaintiff by Kirkland (“Severance Agreement”). Exhibit C or the contents included  
26 therein are referred to in the Complaint at ¶¶16–18, 61.

27 6. Attached as **Exhibit D** are true and correct copies of Plaintiff’s 2020 and 2021 W-2  
28 Wage and Tax Statements and paystubs (“Payroll Documents”). Exhibit D or the contents included

1 therein are referred to in the Complaint at ¶¶16, 62.

2 7. Defendants have redacted from Exhibits A–D certain potentially private information  
3 pertaining to Plaintiff or third parties.

4 I declare under penalty of perjury under the laws of the United States of America that the  
5 foregoing is true and correct. Executed on December 15, 2022.

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